

# **EXHIBIT B**



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

WMP/JK/AES  
F. #2014R00501

*271 Cadman Plaza East  
Brooklyn, New York 11201*

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By Email and FedEx

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Re: United States v. Martin Shkreli, et al.  
Criminal Docket No. 15-637 (KAM)

Dear Counsel:

The government writes to inform you, in an abundance of caution, that Steven Rosenfeld, Alan Geller and Lee Yaffe may have information that is helpful to the defense in the above-referenced case. Specifically, the government provides the following information:

- The materials Bates numbered R024568-R026471, which were produced to the defendants on April 28, 2016, contain statements made by and/or on behalf of Mr. Rosenfeld that he performed services as a consultant for Retrophin in connection with his consulting agreement with the company. Mr. Rosenfeld is currently represented by Andrew St. Laurent, Esq., who can be reached at 646-248-6010.
- During an initial interview with law enforcement, Mr. Geller stated, in sum and substance, that he served a "life coach" to defendant Shkreli and performed some consulting services for Retrophin in connection with a consulting agreement. In subsequent interviews, Mr. Geller stated, in sum and substance, that he only signed the consulting agreement as a means to recover his investment in MSMB Healthcare, and that he did not provide any consulting services to Retrophin in connection with the agreement. Mr. Geller is currently represented by Jeff Cox, Esq., who can be reached at 561-989-9080.
- During an initial interview with law enforcement, Lee Yaffe stated, in sum and substance, that he performed some consulting services for Retrophin in connection with a consulting agreement. In subsequent interviews, Mr. Yaffe admitted, in sum

and substance, that he only signed a consulting agreement with Retrophin to recover his investment in Elea Capital, and that he did not provide any consulting services to Retrophin in connection with the agreement. Mr. Yaffe is currently represented by Fred Schwartz, Esq., who can be reached at 561-910-3070.

In addition, in anticipation of the defendants' potential pre-trial motions, the government encloses for defendant Greebel a copy of defendant Shkreli's prior statements (Bates numbered SHKRELI000001-273, and previously produced to defendant Shkreli on December 22, 2015), and encloses for defendant Shkreli a copy of defendant Greebel's prior statements (Bates numbered GREEBEL000001, and previously produced to defendant Greebel on December 22, 2015).

The government is in receipt of a letter from counsel for defendant Shkreli dated July 5, 2016, and a letter from counsel for defendant Greebel dated July 12, 2016, each requesting the production of materials covered by Brady v. Maryland, 373 U.S. 83 (1963), and Giglio v. United States, 405 U.S. 150 (1972). The government is aware of and will continue to comply with all of its disclosure obligations.

Very truly yours,

ROBERT L. CAPERS  
United States Attorney

By: /s/ Alixandra Smith  
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Enclosures

cc: The Honorable Kiyo A. Matsumoto (by hand delivery) (w/o enclosures)